

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In the matter of the Arbitration	:	
	:	
-between-	:	
	:	
SSI (BEIJING) COMPANY LTD.,	:	Civil Action No. 1:18-cv-8408-DAB
	:	
Petitioner,	:	
	:	
-and-	:	
	:	
PROSPER BUSINESS DEVELOPMENT	:	
CORPORATION,	:	
	:	
Respondent.	:	
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**RESPONDENT AND COUNTERCLAIMANT PROSPER BUSINESS
DEVELOPMENT CORPORATION'S NOTICE OF MOTION FOR
JUDGMENT ON THE PLEADINGS AND TO COMPEL ARBITRATION**

TO ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 12(c) and 9 U.S.C. § 206, and upon its Memorandum of Law in Support of Motion for Judgment on the Pleadings and to Compel Arbitration, Respondent and Counterclaimant Prosper Business Development Corporation ("Prosper") hereby moves this Court for judgment on the pleadings and to compel arbitration of Prosper's breach of contract claims that are the underlying subject matter of this litigation. Based upon the allegations and admissions set forth in the parties' pleadings, and the governing law, Prosper's breach of contract claim must be resolved through binding arbitration. Prosper therefore seeks an order in its favor: (a) denying Petitioner SSI (Beijing) Company Ltd.'s ("SSI-Beijing") Petition to Stay Arbitration, and; (b) granting Prosper's Counterclaim to Compel Arbitration.

Dated: December 18, 2018

/s/ Peter A. Halprin

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